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10 Attorneys for Defendant  
Google LLC

15 ANIBAL RODRIGUEZ, et al. individually and  
on behalf of all others similarly situated,

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF GOOGLE  
LLC'S OPPOSITION TO PLAINTIFFS'  
OMNIBUS MOTIONS IN LIMINE**

Plaintiff,

11

to GOOGLE LLC,

Defendant.

Date: July 30, 2025  
Time: 09:30 A.M.  
Courtroom: 3, 17th Floor, SF  
Judge: Hon. Richard Seeborg

Date Action Filed: July 14, 2025  
Trial Date: August 18, 2025

1 I, Eduardo E. Santacana, declare that:

2 1. I am a licensed attorney in California and a partner at Cooley LLP, located at 3  
 3 Embarcadero Center, San Francisco, California 94111. I am counsel of record for Defendant  
 4 Google LLC (“Google”) in this action. Unless otherwise stated, the facts I set forth in this  
 5 declaration are based on my personal knowledge or knowledge I obtained through my review of  
 6 corporate records or other investigation. If called to testify as a witness, I could and would testify  
 7 competently to such facts under oath.

8 2. I submit this declaration in support of Google’s Opposition to Plaintiffs’ Omnibus  
 9 Motions in Limine (ECF No. 518).

10 3. Attached hereto as Exhibit A is a true and correct copy of excerpts of the  
 11 deposition of Sal Cataldo taken on February 17, 2022.

12 4. Attached hereto as Exhibit B is a true and correct copy of excerpts of the  
 13 deposition of Julian Santiago taken on March 7, 2022.

14 5. Attached hereto as Exhibit C is a true and correct copy of excerpts of the  
 15 deposition of Susan Harvey taken on October 27, 2022.

16 6. Attached hereto as Exhibit D is a true and correct copy of excerpts of the  
 17 deposition of Anibal Rodriguez taken on October 16, 2022.

18 7. Attached hereto as Exhibit E is a true and correct copy of Anibal Rodriguez’s  
 19 Response to Google’s Interrogatory No. 6 dated July 13, 2022.

20 8. On June 24, 2025, Plaintiffs’ counsel sent Google’s counsel a draft of the Pretrial  
 21 Statement announcing Plaintiff Sal Cataldo’s intention to voluntarily dismiss his claims.

22 9. On July 7, July 8, and July 9, 2025, Google sent emails to Plaintiffs’ counsel to  
 23 request assurances that Mr. Sal Cataldo would be available to attend trial. A true and correct copy  
 24 of that email correspondence is attached hereto as Exhibit F. In Google’s email on July 9, Google’s  
 25 counsel included a subpoena for Mr. Cataldo requesting his attendance at trial. Plaintiffs’ counsel  
 26 did not respond to these emails.

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1 Dated: July 10, 2025

COOLEY LLP

3 By: /s/ Eduardo E. Santacana  
4 Eduardo Santacana

5 Attorney for Defendant  
6 Google LLC

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